

11736-PAJ

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MAN FERROSTALL, INC.,	:	07 CIV 3891 (JGK)
	:	
Plaintiff,	:	
v.	:	
	:	ANSWER TO CROSS-CLAIM
M/V "MOON SEA," its engines, tackles,	:	
boilers, etc.,	:	
KINDER MORGAN BULK TERMINALS,	:	
INC., SKARSUN LTD., SKAARUP	:	
MANAGEMENT (HONG KONG) CO.	:	
LTD., MOON SEA SHIPPING LTD.,	:	
KEY MARITIME LTD., COSCO BULK	:	
CARRIER CO. LTD. (COSCO BULK),	:	
	:	
Defendants.	:	
-----	X	

Defendant, **KEY MARITIME LTD.**, by its attorneys, **JUNGE & MELE, LLP**, hereby sets forth the following as its Answer to the unverified Cross-Claim of Defendants, **SKARSUN LTD., SKAARUP MANAGEMENT (HONG KONG) CO. LTD.**, and **MOON SEA SHIPPING LTD.** :

FIRST: Answering Defendant repeats and re-alleges each and every admission, denial and defense set forth in its Verified Answer with Cross-Claim as if more fully set forth at length herein.

SECOND: Answering Defendant denies each and every allegation contained in paragraphs "28," "29" and "30" of the Cross-Claim of Defendants, Skarsun Ltd., Skaarup Management (Hong Kong) Co. Ltd., and Moon Sea Shipping Ltd.

WHEREFORE, Answering Defendant demands that the Cross-Claim be dismissed with costs to Answering Defendant as against cross-claiming Defendants, and that the Court grant such other, further and different relief as the justice of the cause may require.

Dated in the City of New York on November 28, 2007

Respectfully submitted,

JUNGE & MELE, LLP
Attorneys for Defendant
Key Maritime Ltd.

/s/ Peter A. Junge

By _____
Peter A. Junge (PJ-0745)
29 Broadway - 9th Floor
New York, NY 10006
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VERIFICATION

PETER A. JUNGE declares as follows:

1. I am a member of the bar of this Honorable Court and of the firm of Junge & Mele, LLP, attorneys for Defendant, Key Maritime Ltd.
2. I have read the foregoing Answer to Cross-Claim and I believe the contents thereof are true.
3. The reason that this Verification is made by deponent and not by said Defendant is that said Defendant is a foreign corporation, no officers or directors of which are within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by said Defendant.
5. I declare under penalty of perjury that the foregoing is true and correct.

Dated in the City of New York on November 28, 2007

/s/ Peter A. Junge

Peter A. Junge